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August 23, 2012

Joe Yun  
California Department of Water Resources  
Division of Integrated Regional Water Management  
Financial Assistance Branch  
Post Office Box 942836  
Sacramento, CA 94236-0001

**RE: DRAFT FUNDING RECOMMENDATIONS FOR PROPOSITION 84 IRWM ROUND 2  
PLANNING GRANTS**

Dear Mr. Yun:

The Mojave Water Agency (MWA) submitted a Proposition 84 Integrated Regional Water Management (IRWM) Planning Grant proposal for Round 2 of the grant program. The MWA's grant request was for \$959,117 to update the MWA's Integrated Regional Water Management Plan (IRWMP). The update to MWA's IRWMP was required by the Department of Water Resources (DWR) as a condition of accepting Proposition 84 Implementation Grant funds. The MWA has completed most of the "high priority" water management projects identified in the existing 2004 IRWMP and wants to take the opportunity to leverage the mandatory update into a comprehensive retooling of the IRWMP, as well as incorporate a Salt/Nutrient Management Plan that is required by the State Water Resources Control Board. This comprehensive update is anticipated to fully address the future water supply needs for the region, as well as address long-term water quality management considerations for the next decade and beyond. This "comprehensive" IRWMP update is considered a necessary guide for ensuring sustainability for the region, and its usefulness will go far beyond updating to meet the minimum Plan standards required by the State (i.e. climate change, disadvantaged communities, etc.).

On July 27, 2012 DWR staff released draft funding recommendations for the Proposition 84 IRWM Round 2 Planning Grant. The minimum score to receive funds was 33. The MWA received a score of 32, missing an IRWMP funding opportunity by one point. We would like to address several comments in the Proposal Evaluation before DWR releases its final funding decision.

## **RESPONSE TO COMMENTS IN PROPOSAL EVALUATION**

It appears MWA scored lowest on the Work Plan and DAC Involvement portions of the evaluation. We feel our proposal more thoroughly meets those scoring criteria than what is reflected in the scores issued, and would provide the following comments to help DWR staff see how MWA met those criteria:

### **Work Plan**

The evaluation states it is not clear that completion of the proposed Work Plan will result in a standards compliant Plan, and additionally that the Work Plan focuses more on what has been done since the initial Plan was adopted than on each IRWM Plan standard. We disagree with this assessment. A section was included in the Work Plan that describes for each of the 16 IRWM Plan standards, whether the current IRWMP meets the standard, and if not, which task(s) in the Work Plan will update the IRWMP to become standards-compliant.

The evaluation gives two examples—the Objectives Standard and Integration Standard—and states neither were fully addressed in the Work Plan. We disagree with this assessment in both examples. The evaluation states that for the Objectives Standard the process used by the Regional Water Management Group (RWMG) to develop objectives is not described as contained in the current Plan or as a task in the Work Plan. However, the description for the Objectives Standard indicates that Task 3.13 will address the standard. A specific deliverable under Task 3.13.1 is to work with the TAC (a stakeholder group of the RWMG) to revise or reaffirm the Plan Objectives (referred to as “Basin Management Objectives” in the Work Plan), therefore meeting the Objectives Standard. Also, the evaluation states that for the Integration Standard the Work Plan does not describe how the standard will be incorporated into the Plan, but only that we will secure a facilitator (Task 1.5) to assure integration occurs. In the proposal under the description for the Integration Standard, the text references Tasks 1.1, 1.5, and 3.13, which in combination meet the Integration Standard. Task 1.1 is for meetings with the regional stakeholder group (the “TAC”) which consists of many local stakeholders from a variety of water-related fields. The purpose of the TAC meetings is to seek input from the various stakeholders and foster greater integration of regional water management projects within the Mojave IRWM region by bringing all stakeholders together in the same room. Task 1.5 supports this effort with the use of a facilitator, and Task 3.13 organizes, evaluates and integrates management actions identified by the stakeholders. We feel both standards were addressed fully in the proposal.

### **DAC Involvement**

The evaluation states that no detail is given on how DAC groups are to be identified and targeted for outreach efforts, or how involvement from DACs identified will be sustained past the IRWMP update.

With regard to giving specific details for how DAC groups will be identified and targeted for outreach, we recognize a specific methodology for accomplishing this task was not included;

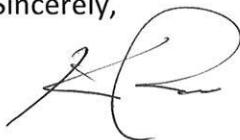
however, MWA did include a task for DAC outreach (Task 1.4). This task will rely on the expertise of the project facilitator and consultant to develop a specific methodology, but deliverables do include preparation of a comprehensive list of DAC community groups and contacts and conducting outreach programs and workshops to receive input from DAC community members.

With regard to sustaining DAC involvement *beyond* the Plan update, we have found nothing in the IRWM Guidelines or the PSP which states this must occur. However, DACs will be involved beyond the planning phase as we move into implementation, because one of the Tasks (3.7) is dedicated to evaluating the water-related needs of DACs, which will translate to projects that will be evaluated in Task 3.13 and potentially implemented to benefit DACs in the future.

## **CONCLUSION**

We believe that the proposal evaluation may have missed or misinterpreted some of the information submitted in our grant application. MWA is requesting that DWR consider the comments above and re-review our application scoring. We appreciate your time and consideration in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kirby Brill', with a stylized, cursive script.

Kirby Brill  
General Manager